



July 29, 2005

BY ELECTRONIC FILING:

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: IB Docket No. 05-221

Dear Ms. Dortch:

Lockheed Martin recognizes the importance of a vibrant mobile satellite service ("MSS") industry to the public interest, and therefore urges the Commission to maintain the existing 2 x 20 MHz allocation for the 2 GHz mobile satellite service ("MSS"). Just two years ago, the Commission reallocated nearly half of the original 2 GHz MSS spectrum to terrestrial wireless services; any further reallocation would seriously hinder future advancements in next-generation MSS systems and networks. Such a step ought not to be taken in light of the many public interest benefits that MSS systems and networks offer to all segments of the public.

First, MSS systems and networks have proven themselves to be an essential part of the national communications infrastructure both in preparation for, and during times of, national emergency and disaster. They also offer important capabilities for cross-border interoperability between and among U.S. and Canada/Mexico during such times. Moreover, unlike exclusively terrestrial networks, MSS networks are instantaneously ubiquitous. In the case of MSS networks with an Ancillary Terrestrial Component (ATC), first responders with MSS/ATC-equipped handsets can communicate to and from virtually *any* location in the continental United States, including the most rural areas as well as densely-populated "urban canyons." Significantly, because MSS/ATC networks necessarily include redundant capabilities, communicating with satellites thousands of miles in the sky as well as with terrestrial base stations, they are considerably less vulnerable to attack than terrestrial-only wireless services and the wireline telephone network.

Second, and also owing to the ubiquitous nature of satellite technology, mobile satellite services are of particular benefit to consumers in traditionally underserved areas. The Commission has appropriately focused on the need for bringing the next generation of mobile communications technology to *all* Americans. Maintaining a stable spectrum allocation in the 2 GHz band will honor that commitment.

Finally, the Commission should refrain from the temptation to conclude that the independent business judgments of a few companies not to pursue their authorizations for new

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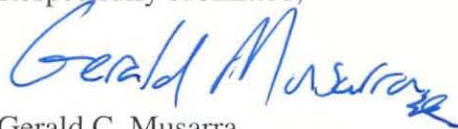
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MSS systems justify, let alone require, a reallocation of the spectrum. As the Commission well knows, the history of the satellite industry is replete with instances where the initial licensees for a service suffered high attrition rates, but that in time, those entities that persevered with sound business plans established successful offerings that materially advance the public and national interests. The Commission made its determination that the 2 GHz MSS service is required to advance the public interest just a few short years ago. It must not undercut that still-valid determination now by precipitously foreclosing access to the 2 GHz spectrum identified for this important service.

Accordingly, Lockheed Martin urges the Commission to maintain the current 2 x 20 MHz spectrum allocation in the 2 GHz band for the mobile satellite services.

Respectfully submitted,



Gerald C. Musarra

Vice President, Trade and Regulatory Affairs
Lockheed Martin Corporation